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**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF UTAH**

PURPLE INNOVATION, LLC,

Plaintiff,

v.

RESPONSIVE SURFACE TECHNOLOGY,
LLC; PATIENTECH, LLC; ROBERT
GOLDEN; et al.

Defendants.

**DEFENDANTS' MOTION FOR LEAVE
TO FILE UNDER SEAL MOTION TO
VACATE, MODIFY, or CORRECT
ARBITRATION AWARD**

**Case No. 2:20-cv-00708-RJS-CMR
Judge Robert J. Shelby
Magistrate Cecilia M. Romero**

INTRODUCTION and RELIEF REQUESTED

Defendants Responsive Surface Technology, LLC, and PatienTech, LLC, hereby move the Court for an order sealing Defendants' Motion to Vacate, Modify, or Correct Arbitration Award and the accompanying exhibits.

Defendants seek leave to file the Motion under seal and to file a redacted version of the Motion to be available to the public (this redacted version has been filed). Defendants also seek leave to seal all the exhibits supporting the Motion, which are being filed with the Appendix of Exhibits.

Good cause exists to seal portions of the Motion and all the exhibits. Many portions of the Motion refer to information and documents that are confidential and have been designated as such pursuant to the applicable protective order. The exhibits themselves consist primarily of such confidential documents. Filing this information publicly would be a breach of Defendants' obligations. Some of the documents even refer to the parties' product plans or business plans.

Much of the information which we seek to seal has already been filed under seal in this matter. We respectfully submit that such information should remain sealed until a party or member of the public seeks otherwise, or until there is a formal reconsideration of the sealing order by the Court.

For these reasons, ReST respectfully requests that the Court grant this Motion to Seal. A proposed order is being submitted herewith.

DATED this 19th day of April, 2024

ANDERSON & KARRENBURG

/s/ Stephen P. Horvat
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